

FRANKEL et al. - 09/492,534  
Client/Matter: 061047-0265649

### REMARKS

Reconsideration and allowance of the present patent application based on the foregoing amendments and following remarks are respectfully requested.

By this Amendment, new claims 43-48 are being added and find support in the application, including, for example, pages 17-24 of the specification and original claims 1, 9 and 10. No new matter has been added. Claims 1-48 are pending in this patent application.

The Office Action maintains the rejection of claims 1-31, 33 and 35-42 under 35 U.S.C. §103(a) as being unpatentable over United States patent no. US 5,732,400 to Mandler et al. ("Mandler"). Applicant respectfully traverses the rejection because the teachings of Mandler fail to disclose, teach or suggest all of the features in the rejected claims.

As admitted in the Office Action, Mandler fails to disclose "the principal entity storing the forwarded request and transmitting an acknowledgement message to the registrar entity, the acknowledgement stating acceptance and authentication/authorization information that the subscriber entity requires for the requested service" as recited in claim 1. Applicant agrees with the Examiner that Mandler fails to disclose this aspect of the claimed invention. However, Applicant further submits that Mandler nowhere teaches or suggests this aspect of the claimed invention and necessarily fails to disclose, teach or suggest "the registrar entity verifying the authenticity of the received acknowledgement message, and, if correct, forwarding the acknowledgement message to the subscriber entity."

While clearly the basic ideas of storage and acknowledgement are well-known, that is not what is at issue here. Rather, the claimed invention involves a specific combination of the storage of a forwarded request and the routing of an acknowledgement message stating particular security information that is unique and non-obvious in view of Mandler.

For example, by storing of a request for service by a principal entity and a trustworthy transmittal to a subscriber entity of an acknowledgement via a registrar entity (trusted party), a certain state shared between the entities (the principal and subscriber entities in particular) can be established that is of a different "trust" quality that may, for example, allow the principal and subscriber entities of that shared state to engage in various actions otherwise not enabled when the acknowledgment with authentication/authorization information assuring the shared state is not passed back to the subscriber entity or not done so correctly (e.g., acknowledging without strong cryptographic authentication). The goal in a cryptographic system is to establish trust. Storing and safely and reliably acknowledging a state is a very meaningful step in such a system beyond simply acknowledging a receipt of a message. It

FRANKEL et al. — 09/492,534  
Client/Matter: 061047-0265649

helps to “close the loop in a trustworthy fashion” by letting a subscriber entity know in a certain fashion the fact that the requested service context has been stored by the principal entity and acknowledged by the principal entity and the acknowledgment authenticated by a registrar entity. As discussed above, based on such trustworthy acknowledgment, the quality of actions and further behavior of the entities may change.

This realization of trustworthy acknowledgment of a stored state is far from trivial and certainly new and non-obvious over Mandler. For example, current on-line banking systems often authenticate a user through a proxy to the banking application but do not authenticate the bank back through a trusted party to the user. This has created a potential for fraud by bogus Web sites, which are not the bank but appear like the bank, to exploit a user to make the user believe he or she is communicating with the bank (known as phishing attacks). Thus, authenticated acknowledgment that assures that a certain state is stored at the bank is not obvious currently even to designers of on-line banking - a most sensitive high value transaction application - and thus helps to demonstrate the non-obviousness of the claimed invention.

Viewed in this context, it is clear that Mandler fails to disclose, teach or suggest a principal entity storing the forwarded request and transmitting an acknowledgement message to the registrar entity. While Mandler discloses a clearinghouse that stores certain data, Mandler does not disclose, teach or suggest a principal entity - a seller - storing a request. Storing a request by a principal entity is significant in the context of the use of a session identifier. *See, e.g.*, Applicant's specification, page 18, lines 15-20 and claim 5. A session identifier may be linked to a particular request and, accordingly, the stored request may be used to process the session identifier, for example, as part of the processing of future responses to the request or as part of a message exchange or transaction associated with the requested service. Thus, a particular state may be preserved between the principal entity - a seller - and a subscriber entity - a buyer. The disclosure in Mandler, as identified by the Office Action, of an accounting system that stores financial data is simply not relevant. Firstly, as noted above, Mandler discloses that the clearinghouse has the accounting system, not the buyer or seller. Further, in no way does a general description of an accounting system to store financial data disclose, suggest or teach storage of a forwarded request for service.

Mandler also fails to disclose, teach or suggest a principal entity transmitting an acknowledgement stating authentication/authorization information that the subscriber entity requires for the requested service. Mandler simply does not disclose, teach or suggest a principal entity - e.g., a seller - transmitting authentication/authorization information that the

FRANKEL et al. — 09/492,534  
Client/Matter: 061047-0265649

subscriber entity — e.g., a buyer — requires for the requested service. Such authentication/authorization information can be used, for example, where the subscriber entity wishes to securely receive the requested service from the principal entity. With such information, the subscriber entity may establish a direct secure connection with the principal entity so that the principal entity may provide the requested service to the subscriber entity without an intermediary registrar entity. Mandler merely discloses transmission by the seller of a quote in response to a buyer RFQ or an acceptance / rejection of a purchase order. In no way does that disclose, teach or suggest transmitting an acknowledgement stating authentication/authorization information that the subscriber entity requires for the requested service.

Mandler also fails to disclose, teach or suggest the registrar entity verifying the authenticity of the received acknowledgement message, and, if correct, forwarding the acknowledgement message to the subscriber entity. As noted above, Mandler simply does not disclose, teach or suggest a principal entity — e.g., a seller — transmitting an acknowledgment stating, among another thing, authentication/authorization information that the subscriber entity — e.g., a buyer — requires for the requested service. Accordingly, Mandler cannot disclose, teach or suggest verifying the authenticity of such a message or forwarding such a message to the subscriber entity. Moreover, even in the context of the transmitted quote in response to a buyer RFQ or acceptance / rejection of a purchase order from the seller as discussed in Mandler, Mandler fails to disclose the clearinghouse verifying the authenticity of the response or acceptance/rejection, and, if correct, forwarding the response or acceptance/rejection to the buyer.

Applicant submits that a case of prima facie of obviousness has not been made out here. As far as Applicant can identify from the passages cited by the Examiner, the only information sent by a seller in Mandler is a quote in response to a buyer RFQ and an acceptance / rejection of a PO. Applicant submits there is simply no disclosure, teaching or suggestion of a principal entity — e.g., a seller — transmitting an acknowledgement message, the acknowledgement stating, in addition to acceptance, authentication/authorization information that the subscriber entity requires for the requested service.

Moreover, Applicants submit that the argument on page 3 of the Office Action that claim 1 is obvious because “Mandler states that at Col. 10, lines 53-50 [sic] that such modification would provide the storing and transmission of data to facilitate the accounting and controls required to track and accomplish financial transactions between various parties”, where such modification refers to “the principal entity storing the forwarded request and

FRANKEL et al. — 09/492,534  
Client/Matter: 061047-0265649

transmitting an acknowledgement message to the registrar entity, the acknowledgement stating acceptance and authentication/authorization information that the subscriber entity requires for the requested service”, begs the question: Does Mandler disclose, suggest or teach such a “modification”? Applicant respectfully submits that the answer is no. Mandler’s disclosure of an accounting system, with associated controls, etc., in no way points to the specific method claimed. For all intents and purposes, any of a myriad number of methods of storing and transmitting data may be employed to facilitate the operation of the accounting system in Mandler. Mandler simply does not provide the clear and direct suggestion or teaching of Applicant’s invention as required by law.

Therefore, for at least the above reasons, Mandler fails to disclose, suggest or teach all the features recited in claims 1-31, 33 and 35-42. Thus, the rejection of claims 1-31, 33 and 35-42 is traversed and claims 1-31, 33 and 35-42 are allowable.

The Office Action also maintains the rejection of claims 32 and 34 under 35 U.S.C. §103(a) as being obvious over Mandler in view of U.S. patent no. US 6,336,095 to Rosen (“Rosen”).

Rosen discloses a system for open electronic commerce having a customer trusted agent securely communicating with a first money module, and a merchant trusted agent securely communicating with a second money module. Both trusted agents are capable of establishing a first cryptographically secure session, and both money modules are capable of establishing a second cryptographically secure session. The merchant trusted agent transfers electronic merchandise to the customer trusted agent, and the first money module transfers electronic money to the second money module. The money modules inform their trusted agents of the successful completion of payment, and the customer may use the purchased electronic merchandise.

Like Mandler, Rosen fails at least to disclose, teach or suggest “the principal entity storing the forwarded request and transmitting an acknowledgement message to the registrar entity, the acknowledgement stating acceptance and authentication/authorization information that the subscriber entity requires for the requested service” and “the registrar entity verifying the authenticity of the received acknowledgement message, and, if correct, forwarding the acknowledgement message to the subscriber entity” as recited in claim 1.

So as Applicant submits above that independent claim 1 is not obvious in view of Mandler and/or Rosen, Applicant accordingly submits that claims 32 and 34, both of which indirectly depend from claim 1, are therefore also not obvious. Thus, for at least the above reasons, the combination of Mandler and Rosen fails to disclose, suggest or teach all the

FRANKEL et al. — 09/492,534  
Client/Matter: 061047-0265649

features recited in claims 32 and 34. The rejection of claims 32 and 34 is traversed and claims 32 and 34 are allowable.

Furthermore, Applicant respectfully submits that new independent claim 43 and its dependent claims 44 and 45 are patentable over Mandel and/or Rosen at least because Mandel and/or Rosen fail to disclose, teach or suggest a method of registering a subscriber entity of a plurality of entities at a principal entity of a plurality of entities, the method comprising a registrar entity of the plurality of entities receiving a request message from the subscriber entity requesting service from the principal entity, the registrar entity verifying the subscriber entity and forwarding the request for service to the principal entity for storage by the principal entity, and the registrar entity receiving from the principal entity an acknowledgement message, the acknowledgement stating acceptance and authentication/authorization information that the subscriber entity requires for the requested service, verifying the authenticity of the received acknowledgement message, and, if correct, forwarding the acknowledgement message to the subscriber entity as recited in claims 43-45.

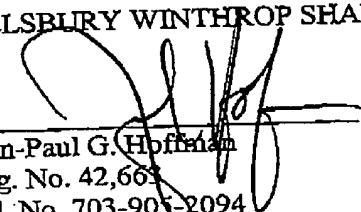
Additionally, Applicant respectfully submits that new independent claim 46 and its dependent claims 47 and 48 are patentable over Mandel and/or Rosen at least because Mandel and/or Rosen fail to disclose, teach or suggest a method of registering a subscriber entity of a plurality of entities at a principal entity of a plurality of entities, the method comprising the principal entity receiving from a registrar entity of the plurality of entities a forwarded request by the subscriber entity for service from the principal entity, the request for service sent to the registrar entity by the subscriber entity and the subscriber entity being verified by the registrar entity, and the principal entity storing the forwarded request and transmitting an acknowledgement message, the acknowledgement stating acceptance and authentication/authorization information that the subscriber entity requires for the requested service, to the registrar entity for verification by the registrar entity of the authenticity of the received acknowledgement message, and, if correct, forwarding the acknowledgement message by the registrar entity to the subscriber entity.

All objections and rejections having been addressed, it is respectfully submitted that the present application is in condition for allowance. If questions relating to patentability remain, the examiner is invited to contact the undersigned to discuss them.

FRANKEL et al. — 09/492,534  
Client/Matter: 061047-0265649

Should any fees be due, please charge them to our deposit account no. 03-3975, under our order no. 061047/0265649. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced deposit account.

Respectfully submitted,  
PILLSBURY WINTHROP SHAW PITTMAN LLP

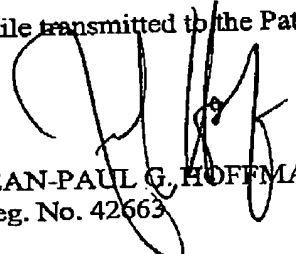


Jean-Paul G. Hoffman  
Reg. No. 42,663  
Tel. No. 703-905-2094  
Fax No. 703-905-2500

JGH  
P.O. Box 10500  
McLean, VA 22102  
(703) 905-2000

**CERTIFICATION OF FACSIMILE TRANSMISSION  
UNDER 37 C.F.R. §1.8**

I hereby certify that this paper is being facsimile transmitted to the Patent and Trademark Office at (571) 273-8300 on July 21, 2005.



JEAN-PAUL G. HOFFMAN  
Reg. No. 42663